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March 10, 2000

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S. W. - Room TWB-204  
Washington, D. C. 20554

Re: Errata, CC Docket No. 00-4, Application by SBC Communications Inc.,  
Southwestern Bell Telephone Company, and Southwestern Bell Communications  
Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region  
InterLATA Services in Texas

Dear Ms. Salas:

Enclosed please find a complete version of Attachment A contained in our ex parte letter submitted on March 8, 2000 in the above-captioned proceeding regarding the Operations Support Systems of Southwestern Bell Telephone Company in Texas<sup>1</sup>. Page 3 of Attachment A was inadvertently omitted from the filing.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 (b) of the Commission's rules.

Sincerely,

ATTACHMENT

cc: D. Attwood	W. Agee	J. Jennings	A. Wright
K. Dixon	R. Atkinson	J. Rosenworcel	
J. Goldstein	C. Blue	D. Shiman	
H. Walker	M. Carey	J. Stanley	
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<sup>1</sup> Attachment A to Ex Parte Letter, from John A. Redmon and David F. Wertheimer, Davis Weber and Edwards, on behalf of AT&T, to Magalie Roman Salas, FCC, CC Docket No. 00-4, filed Mar. 8, 2000.



## ATTACHMENT A

### Review of the Outage Analysis Set Forth in the Affidavit of Judy K. Nix

As noted in the accompanying submission, the Affidavit of Judy K. Nix ("Nix Aff.") submitted by the Texas PUC with its Reply, contains substantial errors which materially undercut its conclusions. These errors are described below.

#### 1. Inaccurate Counting of Executed UNE-P Conversion Scenarios

In its restatement of data, Telcordia recites that it reexamined the pool of UNE-P conversion test case scenarios (from retail or resale), which it represents total 262 of the 514 unique PONs executed.<sup>1</sup> This is not accurate. While 262 were planned, only 213 were executed.<sup>2</sup> Thus, Telcordia has overstated the number of executed UNE-P conversions. Moreover, of those UNE-P conversion scenarios that were executed, only 167 are identified in the Final Report as the subject of feature activation or dial tone testing.<sup>3</sup> Accordingly, Telcordia inflates the denominator in its analysis by more than 36 percent.

#### 2. Dial Tone Testing Results for UNE-P Conversion Orders

During OSS testing, Telcordia identified a set of 62 test cases to be used to determine dial tone/ no dial tone percentages, and reported, based on its review, that there was an 11% loss of dial tone.<sup>4</sup> Of the UNE-P conversion activity lines provisioned, 36 of those were selected for inclusion in the sample for dial tone testing. Thus, if it were to be consistent with the manner in which it reported outages in its Final Report (taking the number of lost dial tones over the number of orders tested for lost dial tone) but confining its analysis to UNE-P conversion orders, Nix should have divided the number of UNE-P conversion outages over 36. Nix reports that 2 of the 36 tested for dial tone -- or 5.5% using the Final Report's methodology -- failed. Reported failures were: 1RM10.1 (p. E01-86) and 2RS2.8 (p. E01-108).

In addition, one of the 36 (IRS1.13, p. E01-14) that is counted as "dial tone only ok" shows "no dial tone --ok" in the Results column and includes a remark "Did this test okay?" in the Comments section. Removing this PON as inconclusive (at best), the reported dial tone failure rate on UNE-P conversions tested should have been 5.7% (2 of 35).

#### 3. Factoring in Feature Activation Testing

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<sup>1</sup> Nix Aff., ¶ 3.

<sup>2</sup> See Telcordia Final Report, p. 38. Telcordia also misstates the number of unique PONs planned to be executed. According to the Final Report, 508 (not 514) were planned and 340 were executed, of which 85% were UNE-P related. *Id.* at 38-39.

<sup>3</sup> Telcordia Final Report, Attachment E01.

<sup>4</sup> Telcordia Final Report, Attachment E20-1.

Telcordia represents that "[o]ut of the 262 conversion orders, the orders that were not tested for "Dial Tone Only" were tested for "other features." Nix Aff. ¶ 6. Accordingly, Telcordia assumes that, because features were tested, dial tone must have been present – again an analysis that was not presented in Telcordia's Final Report. Telcordia's assumption, and the calculations based on that assumption, are, in any event, inaccurate. Attachment E01 identifies only 167 UNE-P conversion PONs to be tested for either features or dial tone. Of the 167, another 10 could not be tested at all and appear in Telcordia's log with an "other" designation (see Attachment E20-1 \* explanation),<sup>5</sup> reducing the total UNE P conversion scenarios tested for features or dial tone to 157. In at least two of these instances, the inability to test is linked to a loss or degradation of service issue. E.g., 1RS2.16 (inbound calling problem; possible no dial tone indicated, E01-109); 1BS3.1 ("Unable to test at all – the #817-472-5442 was not a working # - There is a lot of static on the line???"), E01-137).

#### 4. The Timing of Feature Activation Testing Versus the Timing of Provisioning

Telcordia's new approach to analyzing the data – i.e. reviewing the feature activation log in order to back into a lower service outage percentage -- is not a reliable method because feature testing did not take place on the day that provisioning was completed. Thus, the presence of dial tone at the time of feature testing is not an accurate indication of whether volunteers lost service at or near the time of conversion.<sup>6</sup> In addition to those identified in Attachment E01 as "no dial tone," for example, 2 scenarios listed that are identified as testing "okay" (1RS7.7, p. E01-67 and 1RM17.1, p. E01-98), and 1 scenario counted as "other" (1RS4.8, p. E01-34) are shown on Telcordia's Attachment A Issue Log to have experienced a loss of dial tone. (Corresponding Attachment A – Issues UP-054, -042 and -060).<sup>7</sup> This discrepancy most likely occurs because the loss of dial tone was reported and dial tone was restored prior to feature/dial tone testing. For example, on 1RM17.1 (p. E01-98), the feature testing was conducted on May 25, while the no dial tone trouble ticket was submitted in mid-April. See Final Report, Attachment A- UP-042.

Accordingly, at least these three instances where dial tone was lost and restored should be added to Nix' reported 2 instances of loss of dial tone, for a UNE-P conversion loss of dial tone percentage of at least 3.18% (5/157). If the two instances of inability to test features because of

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<sup>5</sup> Scenarios with "other" designation on all features planned to be tested include: 1RS4.18, 1RS3.2, 1RS4.8, 2RS2.2, 1RS6.10, 2RS1.6, 1RS2.16, 2RS6.2, 1BS3.1, and 2BS3.2.

<sup>6</sup> All conversions were done on additional lines installed in advance specifically for the test. The fact that existing primary lines were not converted reduced the likelihood that volunteers would have detected a loss of dial tone if it occurred at the time of provisioning, so long as dial tone was restored before the volunteer attempted any feature activation or dial tone check.

<sup>7</sup> Mapping the scenarios recorded on Telcordia's feature/dialtone log (Final Report, Attachment E01) to issues included in the Final Report Attachment A Issues Log, which does not include scenario numbers, can be done through the intermediate step of consulting AT&T's Testing Issue Log. AT&T's log, which is attached to AT&T's Comments on Telcordia's Interim Report, contains cross references to assigned test scenario numbers. (SWBT Application, Appendix D, Vol. 2, Tab 43). Because both the AT&T and Telcordia Issue Logs record the date the problem was detected and because Telcordia's listing of service outage occurrences contains exact quotes identified as coming from the CLEC Participant, service outages on Attachment A can be matched to the corresponding AT&T Issue Number which then provides the corresponding test scenario numbers that can be used to find test cases on the Final Report's Attachment E01, Feature Testing Matrix.

service degradation (1RS2.16 and 1BS3.1, discussed above) are included, the provisioning trouble rate increases to 4.4% (7/159).

#### 5. Other UNE-P Conversion Outages

Telcordia's calculation also does not take into account losses of dial tone on UNE-P conversions that were not logged on Attachment E01 as having been included in either feature activation or presence of dial tone testing. For example, 2RS6.6 (UP-041) and 2RS1.3 (UP-046) are identified as having lost dial tone, but are not scenarios even covered in the feature/dial tone testing count.

#### 6. Conclusion

Using Telcordia's original method of reporting loss of dial tone, its 11% figure remains the outage statistic against which regulators must evaluate the impact on CLEC customers, the injury to CLEC reputation, and the ability of SWBT to respond with adequate maintenance and repair capabilities. Applying Telcordia's "revised" method – but limiting the analysis to UNE P conversion test cases only – yields an outage rate of at least 5.7%, which figure does not include undetected loss of dial tone restored before dial tone testing. Finally, even if the admittedly unreliable approach of reviewing feature activation test results is followed, the trouble rate on UNE-P conversion activity test cases examined should have been reported as no less than 4.4%.